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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

333 W. Nye Lane, Room 138

Carson City, Nevada 89706

September 26, 2002

Mr. Dave McCarthy
Atlantic Richfield Company
307 E Park Ave.
Anaconda, Montana 59711

SUBJECT: Draft Final Conceptual Site Model: Yerington Mine

Dear Mr. McCarthy:

The Nevada Division of Environmental Protection (NDEP) has received and evaluated the **Draft Final Conceptual Site Model: Yerington Mine**, dated August 26, 2002, regarding the continued environmental investigation of the Yerington Mine, located in Lyon County near Yerington Nevada. This office provides the following comments from NDEP, EPA, BLM, U.S. Fish and Wildlife and other technical representatives of the Yerington Technical Work Group (YTWG).

General Comments

Figure 1

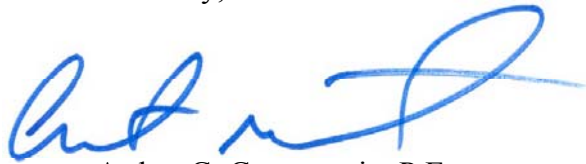
- a) Terrestrial biota should be added for fugitive dust. Some of the specific ecological receptors include livestock (horses) and crops. The exposure route should include dermal and incidental ingestion
- b) The dermal exposure route should be added for sediment for human and ecological receptors, and
- c) Food chain pathways should be listed on the figure or in the text (Atlantic Richfield's response to comments states that it is too difficult to depict this on the

figure). It is important though since fish and/or hunting of game(deer/rabbits) are common in Yerington.

Accordingly, please provide the **Final Conceptual Site Model: Yerington Mine**, which incorporates the above comments. This information must be received not later than October 26, 2002, as per the previously agreed on submittal schedule.

Should you have any questions or if I can be of any assistance, please do not hesitate to contact me at (775) 687-9376 or FAX (775) 687-6396. All future correspondence regarding this subject should be addressed to the undersigned.

Sincerely,



Arthur G. Gravenstein, P.E.
Staff Engineer
Remediation Branch
Bureau of Corrective Action

cc: Ms. Jennifer Carr, NDEP
Mr. Doug Zimmerman, NDEP

Cc: Mr. Joe Sawyer, Project Manager, SRK Consulting, 102 Birch Drive, Yerington NV. 89403

Mr. Dave McCarthy, Atlantic Richfield Company, 307 E Park Ave., Anaconda, Montana 59711

Mr. Chuck Zimmerman, Senior Associate, Brown and Caldwell, 3488 Goni Road, Suite 142, Carson City, NV 89706

Mr. Chuck Pope, Deputy Assistant Field Manager, Bureau of Land Management, Carson City Field Office, 5665 Morgan Mill Road, Carson City, NV 89701

Ms. Molly Mayo, Senior Mediator, Meridian Institute, P.O. Box 1829 Dillon, CO 80435

Mr. Elwood Emm, Chairman, Yerington Paiute Tribe, 607 W. Bridge St., Yerington, NV 89447

Mr. Robert Quintero, Chairman, Walker River Paiute Tribe, P.O. Box 220, Schurz, NV 89427

Mr. Tad Williams, Environmental Director, Walker River Paiute Tribe, P.O. Box 220, Schurz, NV 89427

Mr. Stanley Wiemeyer, U.S. Department of Interior, Fish and Wildlife Service, 1340 Financial Blvd, Suite 234, Reno, NV 89502-7147

Mr. John Krause, Environmental Coordinator, Bureau of Indian Affairs, Phoenix Area Office, P.O. Box 10, Phoenix, AZ 85001

Ms. Bonnie Arthur, Project Manager, U.S. Environmental Protection Agency,
Region IX, 75 Hawthorne Street, San Francisco, CA 94105

Ms. Phyllis Hunewill, Commissioner, Lyon County, 31 South Main Street,
Yerington, NV 89447 Mr.

Steve Snyder, County Manager, Lyon County, 31 South Main Street, Yerington,
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Mr. Dan Newell, Manager, City of Yerington, 102 South Main Street, Yerington,
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Mr. Bob McQuivey, Habitat Bureau Chief, Nevada Division of Wildlife, 1100
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Ms. Libby Levy, 75 Hawthorne Street, San Francisco, CA 94105

Ken Paulsen, Behre Dolbear & Company, Inc., PO Box 1930, Arvada CO 80001